

MEMORANDUM FOR: Deputy Director (Support)

SUBJECT : Records of Uncompensated Overtime

1. This memorandum discusses the problems of accumulating records of uncompensated overtime worked by Agency personnel and the probable values of such information. Recommendations are contained in paragraph 7.

2. ASSUMPTIONS

a. It is assumed that uncompensated overtime should be limited to whole hours of work in excess of the basic workweek for which no compensation is granted as additional pay or as compensatory leave. Fractional hours immediately preceding or following the workday should be disregarded since individual preferences of means of transportation would account for some uncompensated overtime which would be of questionable value to the Agency.

b. Such a record should also be restricted to staff type individuals who are subject to a definite workweek. Individuals serving under contract are not always subject to a 40 hour week and should be excluded for this reason.

c. Uncompensated overtime which should be reported would include official business of the Agency performed outside of the basic 40 hour workweek such as (1) additional office work, (2) meetings with agents, (3) escort duties, etc. Overtime required for travel other than escort duties and for study in connection with Agency-sponsored training should be excluded.

3. POTENTIAL USES

a. It would be of value to have an analysis of the relationship between overtime for which compensation is made and uncompensated overtime, as defined herein, by GS Grade level and type of work, and by allotment component. Such data could serve as a basis for studying the possibility of establishing an Agency premium pay plan similar to that used by the FBI for its agents. Specific types or

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groups of personnel found to be engaged in considerable overtime, both compensated and uncompensated, might be considered for such a special pay plan.

b. Statistics of this type would provide some indication of the extent of the career-interest of Agency staff personnel in promoting the mission of the Agency.

c. These data could be of value at budget hearings with the Bureau of the Budget or Congressional Committees. Hours of uncompensated overtime could be cited as representing specific savings to the Agency from the viewpoint of the dollar savings computed at the applicable overtime rates or on the basis of hours worked converted to the man-year equivalent in lieu of additional personnel. It is pointed out, however, that the use of these data in budget hearings or otherwise outside of the Agency would have to be done with a considerable degree of caution. Once particular statistical data are made available, they may be requested frequently thereafter and become a requirement even though the cost of continued accumulation may not be justified by the value of the data. Also, data in some cases might be less favorable than anticipated and be disadvantageous to the Agency's objectives.

d. The value of obtaining information on the hours of uncompensated overtime worked would be limited somewhat by the extent that information on compensated overtime would also be available or obtained for comparative study. Information is available on tabulated card records for personnel at headquarters paid from vouchered funds with respect to hours of compensated overtime worked. Uncompensated overtime hours could be compared with these data, whereas the same cannot be accomplished under present manual payrolling methods for personnel at field locations paid from vouchered funds or for personnel paid from confidential funds. Time and attendance reports from the field for employees paid from confidential funds are received at headquarters one to three months late which makes it impractical to accumulate accurate data in the payroll unit with respect to the hours of compensated or uncompensated overtime worked by the affected employees in this group.

4. USE OF SIMILAR DATA BY FBI

The Federal Bureau of Investigation has recorded uncompensated overtime for its agents for many years. Informally, it has been learned that the FBI obtains its information from daily work records on its agents which are separate from the

usual time and attendance reports. Summary reports are prepared monthly from the daily work records which are used to substantiate the continuance of premium pay to agents who work an average minimum of overtime. The records on the FBI agents are not a part of any payroll records, nor are they tabulated by machine. Records of uncompensated overtime are not kept on FBI clerical personnel as they generally are paid for all overtime or granted compensatory leave.

5. DISCUSSION

a. The potential value to the Agency of statistics obtained as a management tool should be weighed against the cost to the Agency of assembling the information. Two general methods are available for accumulating the data reported from Agency headquarters and field components namely, manual summarizations or machine tabulations. Under either method the accumulation would not necessarily require additional personnel because the work could be spread over individuals at various organizational levels so that it would affect only a fraction of time of each individual concerned. If the summarizations were to be performed by tabulating machine processing of individual reports, and assuming 1000 reports each bi-weekly pay period showing uncompensated overtime, it is estimated that the cost of summarizing would be \$1000 per year. This cost, of course, would be in addition to that incurred at all levels for (1) establishing the overall procedure, (2) printing of forms and instructions and (3) preparing and handling the individual reports.

b. Any method for accumulating the information should be designed to obviate possible damaging aspects to employee morale as to its potential use against them. A record showing the complete work history for an individual for a given period could be used by some supervisors as an indication of the person's interest, or lack of interest, in his job. A supervisor could impose certain minimums of uncompensated overtime as a criteria for promotions or merely to create a more favorable record for himself as a supervisor. Records by individuals would not be essential at an Agency level unless it were determined to utilize such records on an individual employee basis to support the granting (or continuation) of a premium pay plan for selected types of personnel. However, records by grades would be of interest and of value to pinpoint the type of personnel in a particular component which is contributing uncompensated overtime and the class of positions occupied by such contributors.

c. The individual employee's reaction to a requirement for this type of record could affect its accuracy. For example, an individual may report an off-hand estimate of his time worked which would be influenced by whether he was interested in making an impression or trying to give an honest account of the time. A record maintained for each individual on a day to day basis would probably give best results.

d. The impact on Agency personnel of a new requirement for data on overtime should be carefully considered. A new report would be added to the already heavy burden being carried by those individuals both at headquarters and in the field who are contributing uncompensated overtime. This would appear to be contrary to the effort to eliminate and simplify paperwork and reports whenever possible. A strong and specific need should be evident to justify a decision to collect these data.

6. METHODS SUGGESTED

a. A report separate from regular time and attendance reports or other payroll records is believed to be the best method to acquire information on uncompensated overtime. The use of the present Form 20, Time and Attendance Report, for this purpose would tend to slow down the payrolling process. The method which appears to be most appropriate would consist of providing a special report form which would be the individual's daily record for one or more bi-weekly periods. The individual report would be collected periodically and summarized by the component to which the individual is assigned since it would be the office primarily interested in the accumulated time of a particular individual. Summary reports would be submitted to a central office for manual or machine tabulation on a quarterly or annual basis, as found necessary.

b. The method described in the preceding paragraph could also be used for personnel overseas who are paid from confidential funds. Each station could collect reports from individuals and send a summary report to Headquarters. Since statistics are not available at Headquarters for overseas employees on hours of overtime paid and compensatory time granted in lieu of cash payment, the reports on uncompensated overtime would have more value if the stations would also include these additional data in the summary reports.

7. RECOMMENDATIONS

a. It is the basic view of this Office that the proposed data would be of doubtful value in this Agency unless it were to be obtained on a restricted basis for

a very specific purpose, such as a premium pay plan for selected types of personnel. Notwithstanding the foregoing, if a determination is made that information on uncompensated overtime is necessary, it is recommended that:

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- (1) A separate type of report for the collection of information on uncompensated overtime be developed since the present time and attendance reports for both vouchered and confidential funds payrolls are deemed unsuitable.
 - (2) A trial run be conducted for a period of three to six months in one or more specific offices or components where it is known that considerable uncompensated overtime is performed. Data thus compiled and experience obtained would provide a basis for determining, (a) whether the value of the data to the Agency as a whole would be such as to justify the cost of developing and adopting an Agency-wide plan, (b) how much detail should be reported, and (c) the form in which the data should be presented in order to be most valuable to Agency officials.

E. R. SAUNDERS
Comptroller

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